

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

JANE DOE,

Plaintiff,

v.

**THE UNIVERSITY OF VIRGINIA, et
al.,**

Defendants.

Case No. 3:23-cv-00018-RSB

JOINT MOTION FOR ENTRY OF JOINT STIPULATED PROTECTIVE ORDER

Plaintiff Jane Doe and Defendant Rector and Visitors of the University of Virginia (“University”), by and through counsel, respectfully jointly move this Court to enter a Joint Stipulated Protective Order for the reasons that follow.

MEMORANDUM IN SUPPORT

1. This Title IX action was filed on April 29, 2023. ECF No. 1.
2. Plaintiff alleges that the University was deliberately indifferent to her being sexually harassed by a University professor.
3. The University investigated Plaintiff’s complaint of being harassed by the University professor, which included interviews of Plaintiff and other University students.
4. The University possesses discoverable documents and information that contain confidential and sensitive academic and medical information regarding Plaintiff and other University students.

5. The parties have conferred and agree that entry of a protective order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure is necessary to protect certain confidential and sensitive academic and medical information produced in this matter.

6. To that end, counsel for the parties have met and conferred and reached an agreement regarding a proposed protective order to govern the handling of confidential information in this action. The proposed Joint Stipulated Protective Order is attached as an exhibit to this motion.

7. The parties agree to waive oral argument on this Joint Motion for Entry of Joint Stipulated Protective Order.

WHEREFORE, Plaintiff and the University respectfully and jointly request that this Honorable Court enter the attached Joint Stipulated Protective Order.

Respectfully submitted,

JANE DOE

By: /s/ Devon J. Munro
Counsel

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THE RECTOR AND VISTORS OF THE
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CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2024, the foregoing was filed with the Clerk of Court using the CM/ECF system.

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